



THE CITY OF NEW YORK
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May 26, 2022

BY ECF

Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

Re: Wellington Da Mata v. City of New York, et al.,
21-CV-155 (KPF) (KNF)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department handling the defense of the above-referenced matter on behalf of Defendants the City of New York and Detective Williams (hereinafter “Defendants.”) Defendants write to respectfully request a brief extension of time, 21-days, for defendants to file their motion for summary judgment and a corresponding extension of time for the subsequent deadlines currently set by the Court. *See* Civil Docket Entry dated May 3, 2022. The undersigned was recently assigned to handle a civil trial which is set to begin on June 8, 2022¹. Plaintiff counsel consents to this request and consents to the updated proposed briefing schedule set forth below. The proposed updated briefing schedule is as follows:

- Defendants’ Motion for Summary Judgment is due by July 1, 2022;
- Plaintiff’s Opposition, if any, is due by August 5, 2022;
- The Reply, if any, is due by August 19, 2022.

In light of the upcoming civil trial, defendants respectfully request that the Court grant a brief enlargement of time to the current briefing schedule for defendants’ anticipated motion for summary judgment as well as a corresponding extension of the subsequent deadlines, the Opposition and Reply.

¹ Shaun Young v. Police Officer Cabrera, et al., No. 18-CV-3028 (E.D.N.Y.). *See* Civil Docket Entry dated November 18, 2021.

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/ William T. Gosling

Assistant Corporation Counsel
Special Federal Litigation Division

VIA ECF: *All counsel of record*

Application GRANTED. The parties shall adhere to the above-specified briefing schedule for Defendants' motion for summary judgment.

The Clerk of Court is directed to terminate the pending motions at docket entries 37 and 38.

Dated: May 27, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE